



IT IS HEREBY ADJUDGED and DECREED that the below described is SO ORDERED.

Dated: August 25, 2022.


MICHAEL M. PARKER
UNITED STATES BANKRUPTCY JUDGE

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:

deeproot Capital Management, LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 21-51523 (MMP)

(Jointly Administered)

**ORDER GRANTING MOTION TO (I) EXPEDITE MOTION TO QUASH
BANKRUPTCY RULE 2004 EXAMINATION NOTICES WITH SUBPOENA
DUCES TECUM, AND (II) SHORTEN AND PRESCRIBE NOTICE RELATED THERETO**

Upon the *Motion to (I) Expedite Motion to Quash Bankruptcy Rule 2004 Examination Notices with Subpoena Duces Tecum, and (II) Shorten and Prescribe Notice Related Thereto* (the "**Motion**")² filed by Cycladic International, LLC, ("**Cycladic International**"), Cycladic, LLC

¹ The administratively consolidated chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: *In re Policy Services, Inc.*, 21-51513 (2864), *In re Wizard Mode Media, LLC*, 21-51514 (3205), *In re deeproot Pinball LLC*, 21-51515 (0320), *In re deeproot Growth Runs Deep Fund, LLC*, 21-51516 (8046), *In re deeproot 575 Fund, LLC*, 21-51517 (9404), *In re deeproot 3 Year Bonus Income Debenture Fund, LLC*, 21-51518 (7731), *In re deeproot Bonus Growth 5 Year Debenture Fund, LLC*, 21-51519 (9661), *In re deeproot Tech LLC*, 21-51520 (9043), *In re deeproot Funds LLC*, 21-51521 (9404), *In re deeproot Studios LLC*, 21-51522 (6283), and *In re deeproot Capital Management, LLC*, 21-51523 (2638).

² Capitalized terms used but not defined herein are intended to have the meanings ascribed to them in the Motion.

(“*Cycladic*”), and Thomas N. Andrew (“*Andrew*” and together with Cycladic International and Cycladic, the “*Movants*”) seeking entry of an order granting expedited consideration and other relief concerning Movants’ *Expedited Motion to Quash Bankruptcy Rule 2004 Examination Notices with Subpoena Duces Tecum* (the “*Motion to Quash*”) filed on August 24, 2022 [Docket No. 137]. The Court finds that the Motion should be granted as set forth below.

IT IS, THEREFORE, ORDERED that the **Motion to Quash is scheduled for expedited hearing on September 1, 2022 @10:30am in Courtroom #1, 3rd Floor, 615 E. Houston Street, San Antonio, Texas.**

IT IS FURTHER ORDERED that Movants must serve notice of the hearing on the Motion to Quash in accordance with Local Rule 9014(e) to (a) the Trustee; (b) counsel to the Trustee; (c) the lead Debtor; (d) counsel to the Debtors; (e) the U.S. Trustee; and (f) any other party having appeared and requested notice in the lead chapter 7 bankruptcy case.

#

PREPARED AND SUBMITTED BY:

Stephen J. Humeniuk
LOCKE LORD LLP
600 Congress Ave., Suite 2200
Austin, TX 78701
Telephone: (512) 305-4700
Facsimile: (512) 305-4800
stephen.humeniuk@lockelord.com

***Counsel for Cycladic International, LLC;
Cycladic, LLC; and Thomas N. Andrew***

In re:
deeproot Capital Management, LLC
deeproot Capital Management, LLC
Debtors

Case No. 21-51523-mmp
Chapter 7

CERTIFICATE OF NOTICE

District/off: 0542-5
Date Rcvd: Aug 26, 2022

User: admin
Form ID: pdfintp

Page 1 of 4
Total Noticed: 6

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 28, 2022:

Recip ID	Recipient Name and Address
aty	+ Pulman Cappuccio & Pullen, LLP, c/o Randall A. Pulman, 2161 NW Military Hwy., Suite 400, San Antonio, TX 78213-1844
intp	+ Cynthia E. Bryant, 3419 Justinian, Jefferson, IN 47130-8629
intp	+ Greg Murray, 1503 Tarton Lane, San Antonio, TX 78231-2427
intp	+ Jason McKinnie, McKinnie & Paul, PLLC, 8610 N. New Braunfels Ave., Suite 320, San Antonio, TX 78217-6358
intp	+ Lawson C. Horner, III, 3700 E. Williams Field, #1096, Gilbert, AZ 85295-1150
intp	+ Mel T. Davis, P.O. Box 236, Elmendorf, TX 78112-0236

TOTAL: 6

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 28, 2022

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 26, 2022 at the address(es) listed below:

Name	Email Address
A. Craig Hale	on behalf of Creditor Draper 5 LLC achale@halewoodlaw.com
Catherine A. Curtis	on behalf of Debtor deeproot 3 Year Bonus Income Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot 575 Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com

District/off: 0542-5

User: admin

Page 2 of 4

Date Rcvd: Aug 26, 2022

Form ID: pdfintp

Total Noticed: 6

Catherine A. Curtis	on behalf of Debtor deeproot Studios LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot 575 Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot Growth Runs Deep Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot Tech LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot Pinball LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot Capital Management LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot Growth Runs Deep Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot Tech LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot BonusGrowth 5 Year Debenture Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor Policy Services Inc. catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor Wizard Mode Media LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot Capital Management LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot Studios LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot BonusGrowth 5 Year Debenture Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot 3 Year Bonus Income Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor Wizard Mode Media LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot Funds LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor Policy Services Inc. catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot Funds LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Christopher S. Murphy	on behalf of Creditor Texas Workforce Commission bk-cmurphy@oag.texas.gov sherri.simpson@oag.texas.gov
Don Stecker	on behalf of Creditor Bexar County don.stecker@lgbs.com
Jason M. Rudd	on behalf of JointAdmin Debtor deeproot Pinball LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com
Jason M. Rudd	on behalf of JointAdmin Debtor Wizard Mode Media LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com
Jason M. Rudd	on behalf of Debtor deeproot Growth Runs Deep Fund LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com
Jason M. Rudd	on behalf of Debtor deeproot Studios LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com
Jason M. Rudd	on behalf of JointAdmin Debtor deeproot Capital Management LLC jason.rudd@wickphillips.com,

District/off: 0542-5

User: admin

Page 3 of 4

Date Rcvd: Aug 26, 2022

Form ID: pdfintp

Total Noticed: 6

brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of Debtor deeproot Funds LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of Debtor deeproot 3 Year Bonus Income Fund LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of JointAdmin Debtor deeproot 3 Year Bonus Income Fund LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of JointAdmin Debtor deeproot 575 Fund LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of JointAdmin Debtor deeproot Studios LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of JointAdmin Debtor deeproot BonusGrowth 5 Year Debenture Fund LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of Debtor deeproot BonusGrowth 5 Year Debenture Fund LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of Debtor deeproot Capital Management LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of Debtor deeproot 575 Fund LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of JointAdmin Debtor deeproot Growth Runs Deep Fund LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of Debtor deeproot Pinball LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of JointAdmin Debtor deeproot Funds LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of JointAdmin Debtor deeproot Tech LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of JointAdmin Debtor Policy Services Inc. jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of Debtor Policy Services Inc. jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of Debtor Wizard Mode Media LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

Jason M. Rudd

on behalf of Debtor deeproot Tech LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

John C. Dunne

on behalf of Creditor Silicon Drive Office Venture LLC jdunne@smfadlaw.com, ereddick@smfadlaw.com

John Patrick Lowe

pat.lowe.law@gmail.com plowe@ecf.axosfs.com

Jonathan Petree

on behalf of Creditor CVH University Park LP jpetree@mcsllaw.com

Lynne M Jurek

on behalf of Creditor Brenda E. Jennings lmjurek@jureklaw.com

Lynne M Jurek

on behalf of Creditor Karen Ready lmjurek@jureklaw.com

Lynne M Jurek

on behalf of Creditor Clara Dean lmjurek@jureklaw.com

Lynne M Jurek

on behalf of Creditor Jack S. and Shirley Daniel lmjurek@jureklaw.com

Lynne M Jurek

on behalf of Creditor Jacquelin A. Peters-Farrar lmjurek@jureklaw.com

Lynne M Jurek

on behalf of Creditor Judy Marsolan lmjurek@jureklaw.com

District/off: 0542-5

User: admin

Page 4 of 4

Date Rcvd: Aug 26, 2022

Form ID: pdfintp

Total Noticed: 6

Lynne M Jurek	on behalf of Creditor Philip J. Erdmann lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Donald W. Cook lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Roberta L. Erdmann lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Clyde R. and Shirley Watson lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Richard T. Jennings lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Mary B. Summy lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Pauline Rubin lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor JoAnn Wells Trustee Wells Trust lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Mary G. Marquis lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor David and Paula Burke lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Judith L Werner Ttee Judith L. Werner RLT lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Helene Cook lmjurek@jureklaw.com
Patrick H. Autry	on behalf of Interested Party TuYo Holdings LLC paury@branscomblaw.com, waspcreek@gmail.com;slee@branscomblaw.com
Randall A. Pulman	on behalf of Trustee John Patrick Lowe rpulman@pulmanlaw.com jgonzales@pulmanlaw.com;mvilla@pulmanlaw.com
Raymond W. Battaglia	on behalf of Creditor Conrad Car Wash Inc. rbattagliaw@outlook.com
Raymond W. Battaglia	on behalf of Creditor Susan Conrad Trust rbattagliaw@outlook.com
Raymond W. Battaglia	on behalf of Creditor Cliff Conrad rbattagliaw@outlook.com
Raymond W. Battaglia	on behalf of Creditor CCW Braun Heights LLC rbattagliaw@outlook.com
Stephen J. Humeniuk	on behalf of Interested Party Thomas N. Andrew stephen.humeniuk@lockelord.com molly.batiste-debose@lockelord.com;Autodocket@lockelord.com
Stephen J. Humeniuk	on behalf of Interested Party Cycladic LLC stephen.humeniuk@lockelord.com, molly.batiste-debose@lockelord.com;Autodocket@lockelord.com
Stephen J. Humeniuk	on behalf of Interested Party Cycladic International LLC stephen.humeniuk@lockelord.com, molly.batiste-debose@lockelord.com;Autodocket@lockelord.com
United States Trustee - SA12	USTPRegion07.SN.ECF@usdoj.gov

TOTAL: 77